

EXHIBIT K

11/14/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Amanda Kallet

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-----X

IN RE MATTER OF:

RICHARD KADREY, et al.,
Plaintiffs,
C.A. NO. :
3:23-cv-03417-VC
v.
META PLATFORMS, INC.,
Defendant.

-----X

** HIGH CONFIDENTIAL - ATTORNEYS' EYES ONLY **
** VIDEOTAPED DEPOSITION**
AMANDA KALLET
Thursday, November 14, 2024

Reported by:

Angela M. Shaw-Crockett, CCR, CRR, RMR, CSR

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1 MS. DUNNING: Object to the form. Calls
2 for speculation.

3 A. I don't know.

4 BY MS. GEMAN:

5 Q. Do you have any idea?

6 A. I mean, you need data to train models.

7 Q. Why?

8 MS. DUNNING: Object to the form. Calls
9 for speculation, lacks foundation.

10 A. Why do you need data to train AI models?
11 Kind of how they're built.

12 BY MS. GEMAN:

13 Q. Anything else?

14 A. No. I mean, I'm not a data scientist, so
15 I can't really speak to the specifics.

16 Q. And you pointed us to the acquisition
17 priorities. It says, under Acquisition Priorities:
18 "These are the types of data that we most
19 want to acquire through either licensing or getting
20 publicly available data approved for use."

21 Do you see that?

22 A. Yes.

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1 Q. Do you know who wrote that?

2 A. No.

3 Q. Do you know who "we" refers to here, "We
4 most want to acquire"?

5 A. "We" would be the LLM technical team,
6 potentially -- I'm guessing -- yeah, the people who
7 wrote it.

8 Q. Okay. And it says "through either
9 licensing or getting publicly available data
10 approved for use."

11 What does that mean?

12 MS. DUNNING: Object to the form. Lacks
13 foundation, calls for speculation.

14 A. So before data can be used, it has to be
15 approved internally.

16 BY MS. GEMAN:

17 Q. By whom?

18 A. Legal mostly.

19 Q. Who else?

20 A. I'm not sure because I don't go through
21 those processes. So beyond legal, I'm not sure.

22 Q. Is licensing or publicly available data

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1 the only two options for acquiring data?

2 MS. DUNNING: Object to the form.

3 MS. GEMAN: I can rephrase.

4 BY MS. GEMAN:

5 Q. Are the two ways to acquire data licensing
6 or getting publicly available data outside of
7 licensing?

8 MS. DUNNING: Object to the form.

9 A. No.

10 BY MS. GEMAN:

11 Q. What are other ways to get data?

12 MS. DUNNING: Object to form.

13 A. What kind of data?

14 BY MS. GEMAN:

15 Q. Well, this sentence refers to two ways,
16 and either/or about how to get data.

17 A. Okay.

18 Q. And I'm asking, was anything left out
19 here?

20 Were there other ways to get data that are
21 not shown in this document that were part of the
22 acquisition strategy?